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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RAHINAH IBRAHIM,)	CASE NO.: 3:06-cv-00545-WHA
)	
<i>Plaintiff,</i>)	JOINT STIPULATED REQUEST
vs.)	TO HOLD CASE IN ABEYANCE
)	PENDING IMPLEMENTATION
DEPARTMENT OF HOMELAND)	OF SETTLEMENT AGREEMENT
SECURITY, et al.,)	AND TO SET SETTLEMENT
)	STATUS CONFERENCE
<i>Defendants.</i>)	
)	
)	

1 Plaintiff Rahinah Ibrahim (Plaintiff) and Defendants Department of Homeland
2 Security *et al.* (Defendants) (collectively, the Parties), by and through their respective
3 counsel of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed her Renewed Motion For Attorney's Fees and Costs
5 ("Renewed Motion") on August 20, 2020 (Dkt. 869);

6 WHEREAS, hearing on Plaintiff's Renewed Motion is set for December 17, 2020,
7 at 8:00 a.m.;

8 WHEREAS, the Parties have now entered into a settlement agreement, which has
9 been executed by all Parties and for which final authorization from the Principal Deputy
10 Associate Attorney General has been obtained;

11 WHEREAS, Defendants need time to issue payment pursuant to the settlement
12 agreement;

13 WHEREAS, the Parties have accordingly agreed to file the instant Joint
14 Stipulated Request to hold this case in abeyance pending Defendants' implementation of
15 the settlement agreement, to provide additional time for the carrying out of the terms of
16 the settlement;

17 WHEREAS, the Parties further request that this Court set a settlement status
18 conference regarding the Parties' progress in carrying out the terms of the settlement
19 agreement;

20 WHEREAS, the Parties' joint request is being made in the interests of judicial
21 economy and in good faith, is not for the purpose of delay, and will not prejudice any
22 party;

23 NOW, THEREFORE, based on the above stipulation, pursuant to Civil Local
24 Rules 6-2 and 7-12, and with Defendants and Plaintiff reserving all rights and defenses,
25 the Parties respectfully ask the Court to issue an order, which provides that:

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- 1 1. All current proceedings are held in abeyance, pending the completion of
- 2 Defendants' implementation of the settlement agreement and issuance of
- 3 payment pursuant to the settlement agreement;
- 4 2. A Settlement Status Conference is Set for December 17, 2020, at 11:00 a.m.;
- 5 and
- 6 3. The Parties are to file a joint status report on or before December 15, 2020,
- 7 indicating the status of the Parties' efforts to carry out the terms of the
- 8 settlement agreement; whether this case and all proceedings should continue to
- 9 be held in abeyance; or proposing a schedule for continuing the proceedings on
- 10 Plaintiff's Renewed Motion.

11 Dated: November 4, 2020

Respectfully submitted,

12 UNITED STATES DEPARTMENT OF JUSTICE
13 Civil Division, Federal Programs Branch

14 By: /s/ Indraneel Sur
15 INDRANEEL SUR

16 Attorneys for Federal Defendants

17
18 Dated: November 4, 2020

Respectfully submitted,

19 McMANIS FAULKNER
20 a Professional Corporation

21 By: /s/ Marwa Elzankaly
22 MARWA ELZANKALY

23 Attorneys for Plaintiff
24 RAHINAH IBRAHIM.

ATTORNEY ATTESTATION

I, Indraneel Sur, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

By: */s/ Indraneel Sur*
Indraneel Sur